

4156

NITRIC ACID TANK CAR

03/01/93

OEPA/DOE-FN

2

LETTER



State of Ohio Environmental Protection Agency

Southwest District Office

40 South Main Street
Dayton, Ohio 45402-2086
(513) 285-6357
FAX (513) 285-6404

AR
G-02461
4156
Mar 3 10 41 AM '93
George V. Voinovich
Governor

March 1, 1993

RE: NITRIC ACID TANK CAR

Mr. Jack R. Craig
Project Manager
U.S. DOE FEMP
P. O. Box 398705
Cincinnati, Ohio 45239-8705

Dear Mr. Craig:

DOE's response to Ohio EPA comments and the revised Nitric Acid Tank Car RAWP and CPI&D were acceptable with the exception of the four comments listed below:

1. DOE-FEMP should indicate when the closure plan will be submitted to the Director, Ohio EPA, in order to begin the RCRA closure approval process.
2. Per Comment 10 of the DOE-FEMP U.S. EPA and Ohio EPA Comments and Disposition Records, the draft final document contains new information on the proposed neutralization and treatment of the tank car contents, however, this information does not address the demonstration requests regarding chemical reaction contained in Comment 10.
3. DOE-FEMP proposes that the standard of clean for inorganic-contaminated soil is to be a comparison to FEMP background concentrations as determined by the FEMP soil background study. The RAWP/CPID should include the background values if available.
4. The RAWP/CPID does not completely satisfy the requirements of OAC 3745-66-11 (Closure Performance Standard) in that the plan does not address actions to be taken with the waste once it is contained in the UNH system. DOE/FEMP indicates that the responsibility for treatment and disposal of the tank car contents is assigned to the Removal Action No. 20 UNH System. The plan should establish a better linkage with RA No. 20, to identify a time schedule for when treatment of the nitric acid waste will occur.

(Shah)
partial
action
response
to doe-955-93
(5688)

Mr. Jack R. Craig
March 1, 1993
Page 2

If you have any questions about these comments please contact Phil Harris or me.

Sincerely,



Graham E. Mitchell
Project Manager

GEM/bjb

cc: Jenifer Kwasniewski, DERR
Tom Schneider, DERR
Phil Harris, DHWM
Jim Saric, U.S. EPA
Dennis Carr, FERMCO
Lisa August, GeoTrans
Jean Michaels, PRC
Robert Owen, ODH